

ENVISAGE GmbH – PRIVACY POLICY

Envisage GmbH (“Envisage” or “we” or “us”) takes the protection of your personal data very seriously. Whether you are a former, prospective or current client, the confidentiality and security of your personal data are fundamental requirements to which we are committed. In this respect, Envisage applies the Federal Act on Data Protection (“**FADP**”), as revised with effect from 1st September 2023.

You will find hereinafter important information for you to understand what kind of data Envisage may collect about you when providing its services, the purposes of collecting your personal data and how Envisage deals with the data it processes, as well as information about your rights regarding your personal data and how to exercise them.

1/ DEFINITIONS

For the purpose of this Privacy Policy:

‘Personal Data’ shall have the meaning set forth in the Article 5 let. a FADP, i.e. any information relating to an identified or identifiable natural person;

‘Processing’ shall have the meaning set forth in the Article 5 let. d FADP, i.e. any operation relating to personal data, whatever the means and procedures used, in particular the collection, recording, storage, use, modification, communication, archiving, deletion or destruction of data;

‘Data Controller’ shall have the meaning set forth in the Article 5 let. j FADP, i.e. the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data ;

‘Data Processor’ shall have the meaning set forth in the Article 5 let. k FADP, i.e. the natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Data Controller;

‘Recipient’ means a natural or legal person, public authority, agency or another body, to which the Personal Data is disclosed.

2/ ENVISAGE STATUS ACCORDING TO SERVICES RENDERED

Depending on the type of services provided, Envisage may act as Data Controller or Data Processor.

Envisage provides different kind of services, in particular:

- Support services in relation to life insurance contracts on behalf of an insurance company;
- Investment advisory services;
- Family office services.

When providing support services in relation to life insurance contracts, Envisage acts as a Data Processor of the insurance company on behalf of which it processes Personal Data. As a consequence, it is the responsibility of the insurance company, as Data Controller, to provide you with all the information required by the FADP regarding the Processing of your Personal Data. We therefore invite you to consult the data protection policy of the insurance company you have contracted with.

As regards investment advisory and family office services, Envisage acts as Data Controller. In this case, it is Envisage's responsibility to provide clear and accessible information about how and why your Personal Data is processed. This is the purpose of this Privacy Policy to inform you thereon.

We undertake to process your Personal Data lawfully, fairly and in a transparent manner. As explained in this Privacy Policy, Personal Data is collected for specified and explicit purposes and not further processed in a manner that is inconsistent with those purposes. We take reasonable steps to ensure that Personal Data processed is adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

3/ IDENTITY AND CONTACT OF THE DATA CONTROLLER

Envisage GmbH, registered seat at Seefeldstrasse 94, 8008 Zürich.

Contact for any questions related to Personal Data to be addressed by e-mail to Mr. Didier Despland at: didier.despland@envisage.ch

4/ TYPES OF INFORMATION WE COLLECT AND PURPOSES OF DATA COLLECTION

Envisage collects Personal Data from you in the process of opening a business relationship with you or to perform services in accordance with a contract concluded between you and Envisage.

Envisage only processes Personal Data that is strictly necessary for the purposes listed below:

- Analysing the client's specific needs to propose suitable investments services;
- Conducting due diligence in the process of clients' onboarding as well as ongoing due diligence where applicable;
- Administering clients' relationship (issuing invoices and receiving payments, handling any queries, monitoring services);
- Keeping a client database;
- Providing the services agreed with the client;
- Communicating with the client via any means (including via email, telephone) to send newsletters, other marketing materials and/or invite the client or any related parties to events organized by Envisage or by any affiliated company;
- Responding to requests to exercise the rights of data subjects in accordance with Section 11 of this Privacy Policy.

In this context, we collect Personal Data about you from various questionnaires you may complete and agreements you may sign with us. The information collected may include:

- **Identification data:** surname, first name, address, e-mail address, date of birth, telephone number, ID or passport in case of travel arrangements;
- **Data relating to your family situation:** marital status, number of children;
- **Data relating to your assets:** income, movable and immovable assets; debts; financial assets; tax data; loans; insurances, etc.;
- **Data relating to your professional situation:** company, occupied function, background information relating to professional activities;
- **Data on your risk profile:** investment objectives, knowledge and experience of financial services and investments, financial situation.

In addition to the specific purposes for which your Personal Data is collected, as stated above, Envisage may use your Personal Data for the following purposes:

- Complying with our legal and regulatory obligations, including towards the U.S. Securities & Exchange Commission;
- Responding to compliance requests, particularly those relating to Swiss anti-money laundering and anti-terrorist financing regulations (when applicable);
- Exercising and/or defending legal claims;
- Improving our services.

We do not use your Personal Data for other purposes than those mentioned above.

5/ THIRD-PARTIES WITH WHOM WE MAY PROCESS YOUR PERSONAL DATA

For the purposes outlined above, Envisage may share your Personal Data with third parties, in particular:

- Supervisory and governmental authorities to which Envisage is required to communicate certain Personal Data relating to its clients (e.g. agreements signed by the client, beneficial owners of the assets, transactions, bank accounts);
- Judicial or administrative authorities, including the U.S. Securities & Exchange Commission or Swiss supervisory authorities;
- Third-parties such as auditors, custodian banks, lawyers, consultants;
- Sub-contractors, *i.e.* any services provider appointed by Envisage for the purposes of assisting it in the execution of its obligations (e.g. cloud services, WhatsApp services, administrative and HR services, and/or other operational purposes).

When appointing sub-contractors, Envisage ensures that these sub-contractors are contractually bound by commitments regarding the protection, security and confidentiality of data pursuant to the FADP or equivalent legislation, should they have access to your Personal Data.

6/ SECURITY OF YOUR PERSONAL DATA

Envisage takes the necessary security measures (e.g. firewalls or anti-virus software), notably organizational and technical, to ensure confidentiality, integrity and availability of your Personal Data, as well as the security of our data Processing, in order to protect your Personal Data against unlawful Processing (access, disclosure, use) and against loss, destruction, accidental damage and alteration.

In particular, the following organisational and technical measures have been implemented:

- Our employees only access your Personal Data if that is relevant to their duties and they each are bound by strict professional duty of discretion and confidentiality concerning your Personal Data;
- Our premises and access to our server is protected.

7/ DATA TRANSFER

Your Personal Data is stored in our server, which is located in Switzerland

Envisage may transfer your Personal Data outside of Switzerland. In particular, Personal Data generated from using WhatsApp, both messages and calls, is processed and stored in the U.S. as well as in Switzerland.

Any transfer of your Personal Data outside of Switzerland will be carried out on the basis of (i) Federal Council's adequacy decisions or (ii) standard contractual clauses. Envisage may further rely on the exemptions provided in the Article 17 FADP, notably your express consent or the fact that the communication is directly related to the conclusion or the performance of the contact entered into between you and Envisage as Data Controller or between Envisage and a third-party in your interest.

Envisage draws your attention to the fact that data transferred via a public network, such as the internet or a non-secured e-mail service is not protected, so that third-parties may access the information and use it without your consent or your data may be lost. Also, even if both the sender and the recipient of a message are located in the same country, data may be transferred without controls through public networks to other countries, including to countries that do not offer the same level of protection as the one in your country of domicile. Even if we take all steps currently possible in order to mitigate these risks, Envisage cannot guarantee the confidentiality and the security of messages or documents transferred through public networks (including third-party networks); as a result, Envisage cannot be held liable for any direct or indirect losses incurred by you if they result from the use of such networks. Please note that you can use other means of communication to transfer data to Envisage if you deem this to be necessary or appropriate to protect your Personal Data.

8/ DATA STORAGE

Envisage retains your Personal Data in accordance with the FADP as long as it is needed for the purposes mentioned above. As a result, we erase your Personal Data when retention thereof is no longer reasonably necessary to achieve the purposes of data Processing, or if you ask us to erase your Personal Data, unless retention thereof is required by operation of law or regulations.

9/ COOKIES

The website of Envisage does not use any cookies.

10/ AUTOMATED DECISION-MAKING

Envisage will not take decisions producing legal effects concerning you, or otherwise significantly affecting you, based solely on automated processing of your Personal Data.

11/ YOUR RIGHTS REGARDING YOUR PERSONAL DATA

You have the following rights regarding your Personal Data processed by Envisage:

1. Right to access your Personal Data, including the right to request a copy thereof from us together with information regarding the identity and contact details of the person in charge of data protection within Envisage, the purpose of the Processing, how long the Personal Data will be kept or, if this is not possible, the criteria for setting the retention period, available information on the origin of Personal Data if it has not been collected from you and the recipients or categories of recipient to whom Personal Data is communicated;
2. Right to obtain a rectification of any inaccurate Personal Data;
3. Right to request erasure of your Personal Data (subject to any legal or regulatory duty to retain your Personal Data) and right to restrict the Processing of your Personal Data by Envisage with regard to the protection of privacy and subject to the overriding interests of Envisage; in particular, Envisage may be unable to grant you any of the rights mentioned hereunder, in part or in full, when the Processing of your Personal Data is still required, among other things, to prevent fraud, to meet our legal or regulatory obligations, to retain evidence, to keep a record of transactions or to exercise and/or defend legal claims;
4. Right to request Envisage to deliver your Personal Data in a conventional electronic format if Envisage is carrying out the automated processing of the data and if the Personal Data is being processed with your consent or in direct connection with the conclusion or the performance of a contract between you and Envisage.

You may also request us to transfer your Personal Data to another controller if the requirements above are met and no disproportionate effort is required.

Envisage takes reasonable steps to provide this information within 30 days upon reception of the request. It is provided free of charge.

You can exercise your rights by using the contact information set out in Section 3 above.

A copy of the identity card or passport may be asked by Envisage in order to check the identity of the person asking for the exercise of his/her Personal Data rights.

12/ AMENDMENTS

This Privacy Policy may be updated at any time. Envisage will inform you of the revised Privacy Policy by any means it considers appropriate (notably by e-mails). Any revised Privacy Policy is made available on Envisage's website, which we invite you to consult regularly. The date of the most recent update is indicated at the bottom of this document.

Zurich, 11th October 2024